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SAN FRANCISCO HOUSING AUTHORITY

STATUS OF THE LEAD HAZARDS IN-PLACE MANAGEMENT PROGRAM

OCTOBER 15, 1995

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STATUS OF THE LEAD HAZARDS IN-PLACE MANAGEMENT PROGRAM

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This report discusses the current status of the lead based paint in-place management program (IPM). The elements of the IPM are:

- 1) Training staff and education of residents.
- 2) Cleaning interior window areas and stabilizing deteriorated lead based paint.
- 3) Incorporating LBP controls during maintenance operations
- 4) annual inspections of the condition of LBP components.
- 5) Procedures for dealing with elevated blood lead children.

BACKGROUND

HUD considers the danger of lead based paint (LBP) to resident families sufficient to warrant its abatement from all family developments. However, they recognize that abatement will take many years to accomplish. Consequently, HUD encourages Housing Authorities (HA's) to initiate in-place management programs (IPM) to minimize exposure to LBP hazards until they can be abated. In addition, the Housing Authority Risk Retention Group (HARRG) is concerned about the liability of lead poisoning in children.

HARRG, the Authority's insurance carrier, mandated that member Housing Authorities, including SFHA, conduct Risk Assessments to identify the presence of LBP hazards. After reviewing the SFHA Risk Assessment findings, they concluded that the risk factors for lead poisoning are significant and require prompt action. Consequently, HARRG directed that SFHA initiate and implement an IPM in order to maintain its liability coverage for lead poisoning. In addition, HARRG specified the required elements of an IPM.

HARRG MODEL IN-PLACE MANAGEMENT PROGRAM FOR LEAD BASED PAINT

The HARRG IPM elements can be summarized as follows:

1. Training and Education of residents and staff about the hazards of LBP and measures to control these hazards.
2. Specific actions that correct the effects of deferred maintenance. These so called "Corrective Actions" are:
 - a) cleaning interior window areas and stabilizing deteriorated LBP around the windows.
 - b) stabilizing deteriorated, exterior LBP.
 - c) initiate interim controls for soil areas with high lead concentrations.
3. Maintenance Division Practices to maintain low levels of lead in dust and soil. These practices include:
 - a) LBP repair and clean-up of vacates.
 - b) modifying the work order system to identify LBP surfaces and initiate dust control practices during work procedures on these surfaces.
4. Include LBP Inspection in annual housing quality inspections.
5. Procedures for protecting children with an Elevated Blood Lead.

TRAINING AND EDUCATION

We have conducted LBP information and notification seminars at most family developments. Unfortunately, resident turnout has been poor.

In addition, the Property Manager reviews with each resident the presence of LBP components in their apartment, and the measures a resident can take to minimize exposure to lead hazards. This is done upon initiation of the lease for new residents and at annual certification for existing residents. The remaining developments will be completed by the end of 1995.

An eight (8) hour LBP Awareness Training was held for the Modernization staff architects and inspectors in April 1994.

The Property Managers attended an all day training session in February 1994. The topics covered included the resident notification form and LBP inspection during the annual home inspections.

CORRECTIVE ACTIONS

The "Corrective Actions" component is well underway¹. In-House Construction has 10 painters (4 residents) and is proceeding in a timely fashion. Funding deficiencies preclude proceeding faster.

The funding deficiency is primarily due to HUD's prevailing wage decisions which doubled the project cost and delayed the completion date.

The initial schedule for accomplishing the "Corrective Actions" was predicated on a budget that was based on asbestos worker labor rates of about \$ 14 per hour. Subsequently, HUD decided that this was not the appropriate craft, which forced the Authority to use painters (approximately \$ 33 per hour) instead. Obviously, this means that the budgeted amount is insufficient and that future Comprehensive Grant Funds have to be appropriated. Consequently, the projected completion date for the "Corrective Actions" had to be postponed.

The Authority expects to complete these "Corrective Actions" by mid 1997.

MAINTENANCE DIVISION PRACTICES

The Maintenance Division has been authorized to order the equipment (HEPA vacuums, respirators, protective clothing etc.) they need for LBP work. The work procedures have been developed, so once the equipment is in hand, the employee training will start.

The Maintenance Division should have its LBP program in place by the first of the year.

LBP INSPECTIONS

The Property Managers were trained in February 1994, to do the LBP inspections. In addition, the inspection forms have been developed for almost all family developments. LBP inspections will be incorporated with the Housing Quality Inspections early next year.

ELEVATED BLOOD LEAD (EBL) CHILDREN

The Authority's draft policy and procedure for handling EBL children (Attachment # 2) is consistent with HUD and the San Francisco Childhood Lead Poisoning Prevention Program requirements.

¹

Attachment # 1 is the Table showing the current status of the "Corrective Actions" for family developments.

CONCLUSION

HUD mandates that whenever a Housing Authority has lead based paint in family developments built prior to 1978 it must be abated. In the meantime, HA's are to initiate in-place management programs (IPM) to protect resident children and workers.

HARRG has defined the elements and timetable for the lead based paint IPM that SFHA is expected to implement. Most elements of the SFHA program are well underway.

ATTACHMENT

1

**CURRENT STATUS OF "CORRECTIVE ACTIONS"
TO CONTROL LEAD BASED PAINT HAZARDS**

**LEAD BASED PAINT-COMPLETED CORRECTIVE ACTIONS FOR
DETERIORATED, EXTERIOR LEAD BASED PAINT, INTERIOR LEAD IN
DUST, AND LEAD IN SOIL FOR SFHA FAMILY DEVELOPMENTS
OCTOBER 16, 1995**

CAL #	DEVELOPMENT	# OF UNITS	PAINT ¹	DUST ²	SOIL ³
1-1	HOLLY COURTS	118	X		
1-2	POTRERO TERRACE	469			
1-3	SUNNYDALE	767			X
1-4	VALENCIA GARDENS	246		X	
1-5	BERNAL	208			
1-8	WESTSIDE COURTS	136	X	X	
1-9	WESTBROOK	225			
1-10	POTRERO ANNEX	137		X	
1-11	NORTH BEACH	229			
1-15	PING YUEN	234	X		
1-16	ALEMANY ⁴	159	X	X	
1-17A	HUNTERS POINT	213		X	
1-18(2)	YERBA BUENA	276			
1-18(3)	HUNTERS VIEW	267			

X = REMEDIATION ACTION EITHER COMPLETED OR NOT NECESSARY

¹ Stabilize deteriorated, exterior LBP

² Clean window areas & stabilize deteriorated paint around windows (interior)

³ Remediate bare soil in areas that have high lead levels

⁴ LBP abated during modernization in 1991 & 1992

**LEAD BASED PAINT-COMPLETED CORRECTIVE ACTIONS FOR
DETERIORATED, EXTERIOR LEAD BASED PAINT, INTERIOR LEAD IN DUST,
AND LEAD IN SOIL FOR SFHA FAMILY DEVELOPMENTS
OCTOBER 16, 1995**

CAL #	DEVELOPMENT	# OF UNITS	PAINT ¹	DUST ²	SOIL ³
1-18(4)	ALICE GRIFFITH	254	X	X	X
1-18(6)	PING YUEN NORTH	194			
1-18(7)	HAYES VALLEY	312	X	X	X
1-30	COLERIDGE	2	X	X	
1-30	LUNDY'S LANE	2	X	X	
1-33	THRIFT	1		X	X
1-34	NORIEGA	8		X	X
1-34	RANDOLPH	16		X	X
1-35	GREAT HIGHWAY	9	X	X	X
1-35	48TH AVENUE	7	X	X	
1-42	JOAN SAN JULE	8		X	
1-43	R. PITTS ⁵	203	X	X	X

X = REMEDIATION ACTION EITHER COMPLETED OR NOT NECESSARY

¹ Stabilize deteriorated, exterior LBP

² Clean window areas & stabilize deteriorated paint around windows (interior)

³ Remediate bare soil in areas that have high lead levels

⁵ Post 1978 development and not subject to LBP testing & assessment

ATTACHMENT

2

**POLICY AND PROCEDURE FOR PROTECTING
CHILDREN WITH AN ELEVATED BLOOD LEAD**

SAN FRANCISCO HOUSING AUTHORITY

LEAD BASED PAINT HAZARD POLICY AND PROCEDURES

Definitions:

A Child= Under six (6) years of age

µg/dl= Micrograms of lead per deciliter of whole blood

LBP= Lead based paint

EBL= Elevated blood level

HUD= Housing and Urban Development

Lead Free Unit/Dwelling= A dwelling containing no lead based paint and has interior dust and exterior soil levels below applicable HUD and EPA standards.

Lead Safe Unit/Dwelling= 1. A dwelling with leaded dust levels on floors, interior window sills and exterior window sill below HUD standards (or EPA health based standards) 2. Bare soil lead levels in exterior play areas are below EPA health based standards; 3. No deteriorated lead-based paint or no deteriorated paint that is suspected to contain lead is present on any surface inside or outside the dwelling; 4. A plan to ensure that intact lead-based paint (or suspected paint) does not become a lead hazard in the course of routine maintenance and renovation activities; and 5. Periodic surveillance to ensure that these criteria are met for specific time period.

EMERGENCY CONDITIONS:

Identification of an elevated blood lead level in a child residing in a family development of public housing shall constitute an emergency condition. The Housing Authority's Industrial Hygienist is usually the first person in this Agency to be informed of the name of the family and the address of the high blood lead level condition.

Currently, HUD defines an EBL child as one whose blood lead is at or above 25 $\mu\text{g}/\text{dl}$. When the interior of the unit that the EBL child resides in contains a high level of LBP, the Authority must abate the lead based paint or relocate the EBL family.

To be consistent with the Centers for Disease Control, HUD plans to reduce the definition of an EBL to 15 $\mu\text{g}/\text{dl}$ or higher. The proposed rules state that an EBL child is one with a blood lead level of 20 $\mu\text{g}/\text{dl}$ as a single measurement, or a persistent 15 $\mu\text{g}/\text{dl}$ or greater. This Authority has opted to follow the more protective guidelines, therefore, the following is to be done above and beyond the governing HUD guidelines:

When a child, residing in public housing is found to have a blood lead level at or above 15 $\mu\text{g}/\text{dl}$, the dwelling must be tested and assessed for the presence of a lead based paint hazard within 5 business days. The Industrial Hygienist is to schedule the test and assessment.

Where the results of the testing/assessment finds the "lead safe unit" criteria is violated, the Industrial Hygienist will initiate appropriate action to bring the unit into compliance.

If such testing was not done with the knowledge of the San Francisco Department of Public Health, Childhood Lead Poisoning Prevention Program, that office must be informed of the test results within five (5) business days by the Industrial Hygienist. Additionally, such information is to be provided the Public Health Nurse within that same 5 day time frame.

If a child's blood lead level is still at or above 15 $\mu\text{g}/\text{dl}$ after the second test, the family will be relocated to a lead-free unit or given a Section 8 Certificate/Voucher, if the lead based paint cannot be abated within 15 business days.

If relocation of the EBL family cannot be accomplished within the 15 day period, the Authority will initiate activities that will assure a "lead safe" dwelling pending the family's successful search for housing.

EMERGENCY RELOCATION:

It is important that all activity be well coordinated when a family has to be relocated because of the presence of unacceptable lead based paint levels in an apartment. The following is for the purpose of identifying specific responsibilities of specific offices in order that the objective be achieved.

In all instances, The Industrial Hygienist is to immediately notify the Acting Director for Conventional Housing, the Eligibility unit Manager/Office Supervisor and the Property Manager, of the name and address of the family. Eligibility will immediately search for an acceptable unit of proper size, in which to relocate the family. If a unit of appropriate size cannot be identified within five (5) days, Eligibility will begin to process the issuance of a Section 8 Certificate/Voucher. This effort is to be coordinated with the office of the Assistant Director for Subsidized Housing.

Although it is the EBL family's responsibility to find acceptable housing of their choosing, Eligibility will advise the family that for their continued health and safety, they should seek housing that was constructed after 1978, a date after which lead was essentially eliminated from residential paints. Otherwise, they should seek a unit which has been evaluated and determined to be a "lead safe" dwelling.

When a San Francisco Housing Authority family is relocated because of the presence of LBP, this Agency will assume responsibility for coordinating all activity relative to the relocation, and pay for the applicable costs involved.

ATTACHMENT

B

**JOINT HEALTH DEPARTMENT AND
HOUSING AUTHORITY LETTER TO RESIDENTS
NOTIFYING THEM OF THE
CHILDHOOD HEALTH AND DISABILITY PREVENTION PROGRAM
SERVICES AND BENEFITS**



SAN FRANCISCO HOUSING AUTHORITY

440 TURK STREET • SAN FRANCISCO, CALIFORNIA 94102 • TELEPHONE (415) 554-1200

August 28, 1991

Dear Resident:

We know that nothing is more important to you than the well being of your child. We are also concerned about the health care of children in our community. That's why the San Francisco Housing Authority, Department of Public Health and its Child Health Disability Prevention Program (CHDP) are working together to provide free head-to-toe check-ups for all public housing youth up to five years of age.

The physical will screen for lead toxicity, sickle cell anemia and TB. The health screening will also provide hearing and vision checks and all needed immunizations. As CHDP states, complete health check-ups find health problems before they get serious. Residents should call CHDP at 558-2403 to make arrangements for the free screening. This physical can be used to meet Head Start or other school health clearances.

The Housing Authority is pleased to participate in a preventive health program which also includes lead poisoning screening. We strongly urge you to take advantage of this opportunity to have a complete health check-up for your child.

Again, the number to call to make arrangements for the physical is 558-2403 at CHDP.

Sincerely,

David Gilmore
Executive Director
San Francisco Housing Authority

Sincerely,

Raymond Baxter, PhD
Director
Department of Public Health

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